



ALFRED POLIZZOTTO III\*

EMILIO RODRIGUEZ, JR.

\*(ADMITTED NEW YORK, NEW JERSEY)

LONG ISLAND OFFICE  
1129 Northern Boulevard Ste 404  
Manhasset, New York 11030

July 21, 2022

**VIA ELECTRONIC FILING**

The Honorable Gabriel W. Gorenstein  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *Erdman v. Victor*, 20-CV-04162-LGS-GWG**

Dear Judge Gorenstein:

This firm represents Defendant Adam Victor in the above-captioned defamation action. We write this letter in response to the letter of Tyler Erdman dated July 13, 2022, and in accordance with Your Honor's Order dated July 19, 2022.

First, I wish to apologize to the court for missing the initial deadline. I have been helping to take care of my father, who has become ill as of late, and missed the date for responding to Mr. Erdman's letter. If anything, Mr. Erdman's letter is premature. When he wrote it, there remained almost a month to complete discovery, and there still remains over two weeks until the deadline. We have already furnished hundreds of thousands of pages to him, and have submitted the revised privilege log that was promised. What remains to be submitted to him is a matter of a couple of hundred documents.

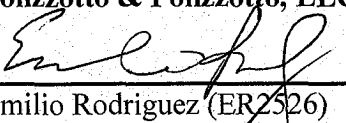
The party who has failed in his obligation to produce documents is Mr. Erdman, who has not provided a follow up link to his earlier production. As we explained in a previous letter, he sent a link for us to download his production, which expired after two weeks, and resulted in my losing access to the documents. This issue has existed since the first discovery deadline. If we

PLEASE RESPOND TO BROOKLYN OFFICE

do not receive a follow up link by August 8, the current deadline, we will be making the appropriate motion to strike his pleadings.

Yours faithfully

**Polizzotto & Polizzotto, LLC**

  
Emilio Rodriguez (ER2526)